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ABSTRACT

The nature and extent of religious activities in public schools is an unresolved issue. While the teacher-led prayer issue was decided in a 1985 Supreme Court decision, the constitutionality of schools' permitting student groups to meet for religious purposes remains unsettled. Compliance with the establishment clause requires government to remain neutral concerning religion. Supported by "Widmar v. Vincent" (a 1981 case permitting a group of college students to use campus facilities for prayer club meetings), Congress passed the Equal Access Act (1984), providing similar rights to public high school students. However, since 1980, three appellate courts have ruled that the establishment clause bans student prayer clubs from public schools. Also, the "Widmar" decision was based partly on college students' supposed maturity and ability to perceive the university's neutrality in permitting prayer clubs. Using interviews of randomly selected high school students, this study sought to determine whether these students could perceive school neutrality if a prayer club were offered as an extracurricular program component. College students were interviewed on the same basis. The role of peer influence on students' decision to join a prayer club was also examined. Findings revealed that only 27.8 percent of high school students could perceive school neutrality toward prayer clubs, whereas 71.5 percent of college students could perceive institutional neutrality. Peers were found to exert little influence on high school students' choice in joining such clubs. Included are 5 tables and 18 references. (MLH)

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School Neutrality or Endorsement: Students' Perceptions of Religious Extracurricular Activities

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A random sample of public high school students were interviewed to determine the extent to which they might view their schools' support for a prayer club if it were offered as part of the extracurricular program. College students were interviewed on the same basis. In addition, the extent to which peers might influence students' decision to join a prayer club was examined. Findings reveal that only 27.8% of high school students could perceive their school as neutral in their support of prayer clubs. At the same time, 71.5% of college students were able to perceive institutional neutrality. Differences in scores were statistically significant ($p < .001$). Peers were found to exert little influence on high school students' choice in joining clubs. While students' "best friends" appeared to have the most influence (1.97 on 5 point Likert Scale), ANOVA revealed no significant differences among scores by year in school or number and type of peer character propositioning prayer club participation.

School Neutrality or Endorsement:
Students' Perceptions of Religious
Extracurricular Activities

The nature and extent of religious activities in public schools is an unresolved issue in many respects. Public interest in the issue was confirmed by the 16th Annual Gallup Poll of the Public's Attitude Toward the Public Schools (Gallup, 1984). While the issue of teacher led prayer was decided by the U.S. Supreme Court (Wallace v. Jaffree, 105 S.Ct. 2479 (1985)), the constitutionality of schools' permitting student groups to meet for religious purposes remains unsettled.

Those who would support "prayer clubs" point to the landmark case Widmar v. Vincent, (454 U.S. 263 (1981)) as a standard. As is true for all questions involving the establishment of church and state, the First Amendment requires that the government remain neutral. It may neither promote nor inhibit religion. In Widmar, the Court permitted a group of college students to use campus facilities for prayer club meetings after they had been denied access to those facilities by university authorities. The Court reasoned that the students were adults and should be able to perceive that the university was neutral in granting permission for the prayer club to use facilities. The university had permitted a number of other student groups to use facilities. Under the circumstances, to deny the prayer club students the use of facilities would have abridged their right of free speech, (Widmar at 274).

Using the Widmar decision for support, Congress passed the Equal Access Act (EAA) in 1984 (P.L. 98-377). EAA provided rights to public high school students to use school facilities for prayer club meetings. The Act requires that public high schools that receive federal funds and allow noncurricular student clubs to meet, provide a fair opportunity to all noncurricular student groups to use facilities regardless of the religious, political, or philosophical nature of the group, (Rossow, 1984).

During the process leading to the passage of EAA, seven students testified before the Committee on the Judiciary. The Committee was impressed with the students' maturity.

> The Committee on the Judiciary observed the maturity and capabilities of the seven students who testified before it and informed the Committee of the need for equal access legislation. The Committee finds that students below the college level are capable of distinquishing between State-initiated, school sponsored, or teacher-led religious speech on the one hand and student-initiated, student-led religious speech on the other. This finding is supported by psychologists as well. (S. Rep at 2381).

However since 1980 three federal appellate courts have ruled that the establishment clause bars student prayer clubs from public high schools. In these decisions, students claims of free speech and free exercise were outweighed by the school's need to fulfill a compelling state interest --

compliance with the establishment clause. As one commentator has noted, "The courts have not been persuaded that student religious groups must be treated like other student organizations, indeed, they have reasoned that the establishment clause demands different treatment (McCarthy, 1985).

In addition to the federal appellate decisions, the U.S. Supreme Court provided some guidance on the question of high school student prayer clubs in the very case that prayer club supporters cite as authority. In Widmar (1981), student clubs at the University of Missouri-Kansas City had been using campus facilities for 5 years for devotional activities. While belated but nevertheless resolute, university officials informed the students that establishment clause restrictions prevented further use of facilities In deciding for the students, the Court ruled that the club's free speech rights required the university to grant use of facilities. In deciding for the students, the Court ruled that the club's free speech rights required the university to grant use of facilities on the same basis as other clubs. While recognizing that the students on campus were adults and should be able to perceive that the university was neutral in granting permission for the prayer club to use facilities, the Court asserted that college students are "less impressionable than younger students" (Widmar at 274 n 14). The reference casts doubt on whether the Court would see high school students as capable at perceiving neutrality.

While the Supreme Court was deciding Widmar, activities in the appeals courts had already begun. In Brandon v. Bd. of Educ. of the Guilderland Central School District,(635 F. 2d 971 (1980)), a group of high school students called "Students for Voluntary Prayer" were denied the use of school facilities for prayer club activities. Refusing to recognize the free speech or free exercise claims, the court reasoned that the students were too impressionable to permit the prayer activities. Citing Romer, v.Bd. of Public Works(426 U.S. 736 (1976)) and O'Hair v. Andres, (613 F.2d 931 (D.C. Cir. 1979)), the court suggested that peer influence plays a major part in the students' impressionability.

Two years later the U.S. Court of Appeals for the Fifth Circuit struck down a Lubbock high school policy that permitted prayer clubs. Citing Brandon at 978, the court reasoned that the impressionability of high school students may lead to the perception of state sponsorship of religion (Lubbock Civ. Liberties Union v. Lubbock Ind. School District, 669 F. 2d 1038, 1043 (5th Cir. 1982)).

In 1984, the U.S. Court of Appeals for the Third Circuit reversed the district court in Bender v. Williamsport Area School District, 741 F. 2d 538 (3rd Cir. 1984)). The court reasoned that the district court had erred in applying Widmar. It doubted that a high school can ever have the open forum that the Supreme Court recognized at the University of Missouri-Kansas City. While high school students do have free speech rights, they do not supercede the school's compelling interest in respecting the establishment clause. It referred to the maturity difference between college and high school students as a factor contributing to a perception of government endorsement for the activity (Bender at 552-553).

When the Bender case finally reached the U.S. Supreme Court in 1986 the question of the constitutionality of prayer club activity was to be resolved. However, the Court did not decide the case on its merits. Instead, it found fault in the appeal procedure. Finding that the appellant had no standing, the Third Circuit should have never heard the case. In effect, the district court decision was left in place. The school board policy preventing prayer clubs in the Lower Marion (Pennsylvania) School District was struck down.

While the question of high school students maturity to perceive religious neutrality is central to the legal argument, the courts have not yet referred to psychological authority to help resolve the issue. The courts have assumed that high school students are not mature enough to perceive neutrality. The courts see high school students as driven by peer influence and not capable of making the kind of independent judgments necessary for joining a prayer club, (Brandon at 978) and (Lubbock at 1094). Congress also relied primarily on the testimony of students when it assumed, contrary to the courts' position, that students indeed are mature enough to perceive religious neutrality. However, Congress did make a reference to a Yale Law Journal article (1983) which asserts that a review of the literature supports the notion that high school students have sufficient maturity to perceive government neutrality. However, there are several psychological studies which indicate that peers exert a considerable amount of influence upon adolescents and that maturity may vary within the adolescent population (Lasseigne, 1975; Damon, 1983; Brittain, 1963; Smith & Cox, 1976 and Selman, 1977). The Yale article makes a general review of developmental psychology but fails to make the connection to the specific question of perception of religious neutrality. To date there are no studies which directly answer this question.

The primary purpose of the present study was to determine whether public high school students could perceive neutrality if school authorities permitted prayer clubs to meet on school premises before or after school. Of collateral interest was the determination of the accuracy of the notion that high school students are influenced by peers to the extent that they are prevented from making a sufficiently independent judgment regarding joining a prayer club.

For the study foci, three null hypotheses were developed. Hypothesis one: There is no significant relationship between the levels of perception of religious neutrality of high school and college students. Hypothesis two: There is no significant relationship between the level of perception of religious neutrality and the students' year in high school. Hypothesis three: There is no significant relationship between the levels of peer influence in joining prayer clubs and the students' year in school.

If it was true that high school students can perceive religious neutrality to the degree that the university students could in the Widmar case, then legal objections to high school prayer clubs are dissipated. If, however, high school students cannot perceive neutrality as do college students, the position of the federal courts would be supported. In addition, the reason the courts have used to account for the lack of student

maturity -- peer influence, will be detected, if present, independent of the neutrality question.

Either high school students are mature enough to perceive religious neutrality as do college students or they are immature, impressionable, and subject to peer influences which cloud an ability to make the kind of judgment necessary about church/state.

METHOD

Description of Target Populations - Sample

Two distinctive populations were targeted for the study. One population was represented by the students at the University of Missouri-Kansas City. UMKC is a large urban university with a diverse student population of approximately 24,000. A random sample of 700 students was drawn from the total population of students whether full or part-time, male or female, regardless of major or year in school.

The other population consisted of public high school students from a medium-sized town in the mid-west. All high schools in the district participated (N=3) each displaying different socioeconomic characteristics. Student enrollment among the three schools was similar (1, 185, 1,418, and 1,697). Ninety students were drawn from each class at each school from class totals of 1,070, freshman; 1,175, sophomores; 1,026, juniors; and 894, seniors.

Instrumentation

A review of instruments used by other researchers to measure student perceptions suggested that directly asking students "how they felt" about the issues was appropriate. Therefore, a five-point Likert Scale was used for responses to the questionnaire.

The questionnaire was divided into two parts. Part I attempted to measure the extent to which students could perceive school neutrality toward religion if authorities were to permit a prayer club to organize. Part II asked students to determine to what extent they would be influenced to join a prayer club if they knew certain peers had already joined.

The four questions in Part I were primarily based on the standards set by the federal courts in determining whether a prayer club might be constitutionally permissible (see Widmar at 274, Brandon at 978, Lubbock at 1043, Bender at 552). Question I asks students to access the general level of support given all clubs by their respective schools. Here the general level of support should be low if constitutional problems are to be avoided. Question 2 is a questionnaire "breaker", however, the information provided may be of some significance for future analysis of the data. Question 3 asks students to determine whether they think their school would support a prayer club any more than other clubs. Here, a response of 1 would indicate the student can perceive neutrality. If the student thinks the school might provide additional support beyond that given other clubs

(responses 2, 3, 4 or 5), this would signal a constitutional problem. In order to give those students who perceive the school might act less than neutral toward a prayer club an opportunity to respond, question 4 was developed. Except for response 1, which would be the same as in response 1 of question 3, the responses indicate less support for prayer clubs than other clubs.

In Part II, students are introduced to an increasing number and type of peer characters with each question. The peer characters were based on actual examples given by the federal appellate courts in holding that high school students are impressionable and would be influenced by peers to join a prayer club (Brandon at 978, Lubbock at 1043 citing Brandon, Bender at 551 citing Brandon). Suspecting that the courts were in error in their choice of whom has peer influence, the researchers introduced "your best friend" as an additional character.

An expert panel of scholars and practitioners was assembled to validate the instrument. A total of three experts were asked to amend the instrument in any way they individually thought would increase validity. After amendments were made, the panel was asked to rate the instrument on a scale of 1 to 5 (5 being the highest) regarding the extent to which the instrument measured religious neutrality and peer influence. Two experts gave the instrument a 4 and one gave a 5 rating.

Credentials of the panel were varied, with the following being represented: college professor-developmental psychology; doctorate-level practicing school psychologist; and academic attorney specializing in church/state/education issues.

Procedures

Consent was obtained from officials at UMKC and the public high school district to conduct the study. The names and addresses of the entire student body at UMKC was provided by university administrators. Administrators of the public high schools cooperated by providing mailing labels for all students by class.

The mailing included the questionnaire, instructions, and a stamped return envelope. The UMKC group produced returns of 19.7% (N=138) and the high school group 11.0% (N=119). The twelve high school study groups (four classes at each of three schools) produced cell responses from 4 to 16. In order to increase overall responses within the high school group as well as within the cells, a follow-up telephone survey was conducted. Using the telephone directory, students who were drawn but did not respond were identified. Contacting students in alphabetical order by class and school produced an additional 13.5% (N=146) response. Cell responses were both increased and evened out (21 to 27). Final high school responses totaled 24.5% (N=265).

The same instrument used in the mail survey was used in the telephone survey. Callers were graduate students who were not familiar with the research hypotheses. A comparison of the responses of the mail survey shows no appreciable differences.

ANALYSIS OF DATA AND FINDINGS

Hypothesis One: There is no significant relationship between the levels of perception of religious neutrality of high school and college students.

Question three of the perception instrument asks students to what extent they might perceive their school supporting a prayer club more than other clubs. On the 5 point Likert scale, responses could range from 1 - no more support than other clubs, to 5 - very much more support than other clubs. For analytical purposes, responses were recoded 1=1; 2&3=2; 4&5=3. If the courts are correct about the ability of college students to perceive religious neutrality (Widmar at 274), and the inability or immaturity of high school students to perceive religious neutrality (Widmar at 274 n. 14, Brandon at 978, Lubbock at 1043, Bender at 552), scores for the UMKC students should be relatively high where scores for high school students lower than that of the college students.

A score of 1 would indicate that the student perceives the school in an absolute neutral posture thus giving no support than other clubs. Table 1 shows that almost 90% of the college students were able to perceive their institutions neutral posture toward prayer clubs. However, only 66% of high school students can perceive religious neutrality. Differences in mean scores were statistically significant ($p < .001$). However, only after factoring out those students who perceive their school as having a posture less than supportive than those who perceive absolute neutrality be identified.

Table 1

Religious Neutrality Perception Scores by Group

(in percent)

	High School Students	College Students
Perceived absolute neutrality	66.0	89.1
Perceived some neutrality	31.7	8.0
Perceived no neutrality	2.3	2.9
N=	262	137

$X^2 = 27.95$
$p < .001$

In table 2, scores from question 4 would indicate a measure of support which is less than for other clubs. Again, if the courts are correct about the ability of college students to perceive neutrality and the immaturity of high school students to perceive religious neutrality, scores for college students should differ significantly from high school students. Responses were recorded for question 4, 1=1; 2&3=2; and 4&5=3. Therefore those students who answered 1 (no more support than other clubs) in the previous question, were asked to complete question 4. Those who responded with a 1 on question 4 (no less support) were confirming their perception of neutrality. Response 1 on Question 4 is the same as response 1 on Question 3.

Table 2

Perception of Less Support for Prayer Clubs by Groups

(in percent)

	High School Students	College Students
Perceived no less support (same as response 1 of Q3)	42.1	76.9
Perceived somewhat less support	43.9	17.4
Perceived much less support	14.0	5.8
N=	171	121

$X^2 = 34.82$
$p < .001$

In order to identify those students who only perceive neutrality (no more support/no less support), the responses of question 4 were subtracted from the responses of question 3. Among the college students who perceived neutrality in question 3, 23.2% perceived some form of support less than that of other clubs. Among high school students who saw neutrality in question 3, 57.9% saw less support than for other clubs. The differences in the mean scores were statistically significant ($p < .001$). Subtracting those who saw less support from each group, (N=98 for high school; N=28 for college) showed that 67.9% of college students saw their institution in an absolutely neutral posture toward prayer clubs. On the other hand, only 27.5% of high school students could make the same perception of absolute neutrality. Differences were statistically significant ($t=7.7$, $p < .001$).

Determining the extent to which students perceive their school supporting extracurricular clubs generally was an important consideration. Even if students perceive neutrality (schools supporting a prayer club no more than other clubs), if the general level of support for all clubs is high, then in effect students would be seeing this high level of support for prayer clubs just as they do for all clubs. Table 3 shows the results of question 1 in which students were asked to what extent they saw their school supporting all non-subject related clubs. As in other questions, responses were recorded.

Table 3

Perception of Support for All Non-Subject Related Clubs

(in percent)

	High School Students	College Students
Perceived little support	17.9	35.8
Perceived moderate support	46.2	50.0
Perceived high level of support	35.8	14.2
N=	171	121

$X^2 = 21.55$
$p < .001$

82% of high school students perceived their school supporting clubs generally. The support for these kinds of clubs as seen by college students was less (64.2%). However, if the position of the Supreme Court in the Widmar case regarding the relative neutrality of universities toward support for clubs is correct (Widmar at 274) then one would expect to find a majority of college students perceiving support at the lower level. As it was, only 35.8% of college students perceived support at the lower end. Differences in mean scores were statistically significant ($p < .001$).

Overall these findings tend to support the position of the federal courts that high school students, unlike their college counterparts, are not able to perceive religious neutrality. At the same time, the findings tend to refute the position of Congress in their support of the Equal Access Act (PL 98-377). The comparison between college and high schools are sufficiently great enough to result in significant differences in both groups ability to perceive religious neutrality. Therefore, null hypothesis one was rejected.

Hypothesis Two: There is no significant relationship between the level of perception of religious neutrality and the students year in high school. Scores from question 3 were compared among students in the three study high schools by class (freshman, sophomore, junior and senior). Table 4 shows that the number of students able to perceive religious neutrality slightly increases with the year in school.

Table 4

Religious Neutrality Perception Scores by Year in High School

(in percent)

	Freshman	Sophomores	Juniors	Seniors
Perceived absolute neutrality	57.6	65.0	70.7	70.5
Perceived some neutrality	39.4	30.0	28.0	29.5
Perceived no neutrality	3.0	5.0	1.3	0.0
N=	66	60	75	61

$X^2 = 6.63$

$p < .35$

At the same time the percent of those who perceive no neutrality but rather undue support for clubs decreases as the students advance in years. 70.5% of the seniors could perceive absolute neutrality while only 57.6% of the freshman would make the same perception.

While differences in responses were apparent, no statistical significance was found to support the observed differences. There is over a 35% probability that the differences occurred by chance. Therefore, null hypothesis two was accepted.

Hypothesis Three: There is no significant relationship between the level of peer influence and students' year in school.

Part II of the instrument asked students to respond to five questions. In each question the student was asked to consider whether they might be influenced to join a prayer club if they knew certain peers had already joined.

Each of the five questions posed a certain combination of peers for consideration. In the first question, the "Captain of the football team" was introduced as already participating. Question two added the "Student body president". The next question added the "Leading actress in the school play". The following question added "your best friend only" as participant. The last question presented only their best friend for peer influence. In each case the student was to indicate the extent of influence due to the presence of peers, (Response 1 = not influenced, 2 = a little influenced, 3 = somewhat influenced, 4 = strongly influenced, 5 = very strongly influenced). Responses were also recoded so 1 = 1 and 2; 2 = 3; and 3 = 4 and 5.

Table 5 provides the descriptive statistics on the relative influence of the presence of peers in joining a prayer club by year in school.

Table 5

Influence of Peers on Prayer Club Participation

(Mean Scores)

	Freshmen	Sophomores	Juniors	Seniors
Captain of the football team	1.11	1.27	1.16	1.05
Captain of the football team and Student body president	1.18	1.25	1.21	1.15
Captain of the football team and Student body president and Leading actress in the school play	1.30	1.36	1.20	1.18
Captain of the football team and Student body president and Leading actress in the school play and Your best friend	1.97	1.81	1.71	1.81
Your best friend only	1.97	1.90	1.84	1.93
N=	66	60	75	60

There appears to be little influence that peers exert on a students' choice to join a prayer club. There were no scores in the moderate, strongly influenced or very strongly influenced range. The highest score (1.97) was in the little influence category. Slight increases could be observed as more peer characters were introduced for consideration. In addition, peers appeared to be less of an influence on decision making as the student advanced in years. In order to determine whether the differences among the means were great enough to be statistically significant, Analysis of Variance (ANOVA) techniques were employed for each set of peer characters.

Statistical significance among the means scores was found only for question 1 in response to the presence of the "captain of the football team" ($p < .02$). Differences in scores for question 2 (Captain of football team and student body president) resulted in $p < .59$. For question 3 (Captain, president and leading actress) resulted in $p < .30$. For question 4 (Captain, president, actress and your best friend) resulted in $p < .89$. For question 5 (Your best friend only) resulted in $p < .91$.

The preponderance of evidence suggests that null hypothesis three should be accepted.

CONCLUSIONS AND IMPLICATIONS

The conclusions that the findings indicate are:

1. There is a positive relationship between the levels of perception of religious neutrality of high school and college students.

2. There is no significant relationship between the level of perception of religious neutrality and the students' year in high school.

3. There is no significant relationship between the level of peer influence and the students' year in school.

The findings provide insight into the debate concerning the maturity of high school students to perceive religious neutrality. The data tends to support the notion that high school students cannot perceive neutrality. While a minority of students see their schools as providing no more support for prayer clubs than other clubs, the level of support given all clubs (including prayer clubs) is seen as generally high. Therefore, it can be argued whether the high school setting could ever achieve the necessary neutral posture given the role it must play in supporting extracurricular activities. While the findings support the federal courts in their position that high school students cannot perceive religious neutrality, it does not support their notion of the role of peer influence. There appears to be no influence of peers in the choice of students to join a prayer club.

References

1. Brittain, C. (1963). Adolescent choices and parent-peer class pressure. American Sociological Reviews, 28, 385-391.

2. Damon, W. (1983). Social and personality development. New York: W.W. Norton & Co.

3. Gallup, A. (1984). The 16th Annual Gallup poll of the publics attitudes towards the public schools. Phi Delta Kappan, 66, 23-38.

4. Lasseigne, M.W. (1975, summer). A study of peer and adult influence on moral beliefs of adolescents. Adolescence, 10, (38). 227-230.

5. McCarthy M. (1985, August). Religion and public schools: Emerging legal standards and unresolved issues. Harvard Educational Review, at 296.

6. Rossow, L.F. (1984, November). Can "The Equal Access Act" survive the three part test? or vice versa! NOLPE NOTES, 18, at 1.

7. Selman, R., & Jaquette, D. (1977). Stability and oscillation in interpersonal awareness. en. C. Kessey (Ed.). Nebraska Symposium in Motivation, 25. Lincoln: University of Nebraska Press.

8. Smith, F. & Cox, B. (1976). Secondary Schools in a changing society. New York: Holt Rinehart & Winston.

9. The constitutional dimensions of student initiated religious activity in public high schools. (1983). 92 Yale Law Journal, 499, 507-509.

Bender v. Williamsport Area School District, 741, F.2d 538 (3rd Cir. 1984).

Brandon v. Bd. of Ed. of Guilderland Central Schools, 635 F.2d 971 (2nd Cir. 1980).

Lubbock Civ. Liberties Union v. Lubbock Ind. Sch. Dist. 669 F.2d 1038 (5th Cir. 1982).

O'Hair v. Andrus, 613 F.2d 931 (D.C. Cir. 1979).

P.L. 98-377.

Romer v. Bd. of Public Works, 426 U.S. 736 (1976)

S. Rep. No. 98-357, 98th Cong., 1st Sess. (1983-1984).

Wallace v. Jaffree, 105 S. Ct. 2479 (1985).

Widmar v. Vincent, 454 U.S. 263 (1981).